

# FELONY

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA

**BILL OF INFORMATION FOR THEFT OF GOVERNMENT FUNDS**

UNITED STATES OF AMERICA	*	CRIMINAL DOCKET NO.
v	*	SECTION:
GARRETT GORDON GOODBEE	*	VIOLATION: 18 U.S.C. § 641
	* * *	

The United States Attorney charges that:

**COUNT 1**

**A. AT ALL TIMES MATERIAL HEREIN:**

1. From on or about 1992 to on or about December 2007, including August 29, 2005, the defendant, **GARRETT GORDON GOODBEE**, used as his primary residence, a home located at 4428 St. Peter Street, New Orleans, Louisiana 70119, located in the Eastern District of Louisiana.
2. On or about October 2004, the defendant, **GARRETT GORDON GOODBEE**, purchased a vacant lot located at 5825 Argonne Boulevard, New Orleans, Louisiana 70124. Starting in 2004 through August 29, 2005, the defendant, **GARRETT GORDON GOODBEE**, began constructing a home on the property which was only partially completed on August 29, 2005.

3. Hurricane Katrina made landfall in Louisiana on August 29, 2005, and caused widespread damage to the Gulf Coast region of Louisiana, including the New Orleans, Louisiana area.

4. At the time of the Hurricane, the structure located at 5825 Argonne Boulevard, New Orleans, Louisiana 70124 was not occupied.

5. At the time Hurricane Katrina struck Louisiana, 5825 Argonne Boulevard, New Orleans, Louisiana 70124, was not the primary residence of the defendant, **GARRETT GORDON GOODBEE**.

6. After Hurricane Katrina devastated the Gulf Coast area, including New Orleans, Louisiana, and as a result of legislation passed by the Congress of the United States of America with the approval of the President of the United States, funds were appropriated to the United States Department of Housing and Urban Development ("HUD"), a department or agency of the United States, for a Community Development Block Grant ("CDBG") for Louisiana Hurricane Katrina victims. The purpose of the CDBG was to assist owners of property damaged or destroyed by Hurricanes Katrina and Rita in August and September 2005. The grant money was disbursed under a program known as the Louisiana Road Home Program ("the Road Home Program"). HUD prepared the rules and regulations governing the disbursement of grant money throughout the State of Louisiana. The State of Louisiana, through the Office of Community Development (OCD), Division of Administration, contracted with ICF International, Inc. to administer the Road Home Program.

7. One of the main requirements for receiving grant money from the Road Home Program was the damaged property was the primary residence of the applicant on August 29, 2005.

8. On or about November 21, 2006, the defendant, **GARRETT GORDON GOODBEE**, submitted his completed application for Road Home Program funds online, declaring falsely and fraudulently in the application that on August 29, 2005, his primary residence was 5825 Argonne Boulevard, New Orleans, Louisiana 70124.

9. On or about June 6, 2007, in the Eastern District of Louisiana, the defendant, **GARRETT GORDON GOODBEE**, attended and completed his closing to obtain Road Home Program grant funds. As part of the closing, the defendant, **GARRETT GORDON GOODBEE**, submitted a completed, signed Road Home Program Grant Recipient Affidavit stating that his primary residence was 5825 Argonne Boulevard, New Orleans, Louisiana 70124 on the date Hurricane Katrina struck Louisiana. As a result of his false and fraudulent representations, the defendant, **GARRETT GORDON GOODBEE**, received federal funds from the HUD Community Development Block Grant disbursed under the Road Home Program in the amount of \$104,930 on June 12, 2007.

**B. THE OFFENSE:**

10. From on or about November 21, 2006, to on or about June 12, 2007, in the Eastern District of Louisiana and elsewhere, the defendant, **GARRETT GORDON GOODBEE**, did knowingly steal, purloin, and convert to his own use, money of the United States Department of Housing and Urban Development, a department and agency of the United States, to which he knew he was not entitled, having a value of \$104,930; all in violation of Title 18, United States Code, Section 641.

## **NOTICE OF FORFEITURE**

1. The allegations in this Bill of Information are re-alleged and incorporated by reference as though set forth fully herein for the purpose of alleging forfeiture to the United States of America pursuant to the provisions of Title 18, United States Code, Sections 641, and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461(c).

2. As a result of the offense alleged herein, the defendant, **GARRETT GORDON GOODBEE**, shall forfeit to the United States pursuant to Title 18, United States Code, Sections 641, and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461, any and all property, real or personal, which constitutes or is derived from proceeds traceable to a violation of Title 18, United States Code, Section 641.

3. If any of the property subject to forfeiture pursuant to Paragraph 2 of this Notice of Forfeiture, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to seek forfeiture of any other property of said defendant up to the value of the above forfeitable property.

All in violation of Title 18, United States Code, Sections 641, and 981(a)(1)(C), made applicable through Title 28, United States Code, Section 2461.



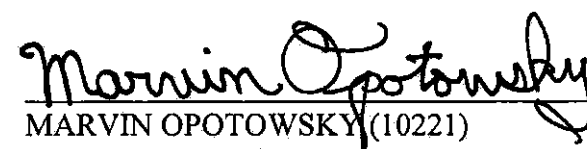
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New Orleans, Louisiana  
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